

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

COLLIN JILLA AND MARY )  
MACIEJEWSKI, )  
Plaintiffs, )  
v. ) Case No.  
CLIENT SERVICES, INC., )  
Defendant. ) **Jury Demanded**

**COMPLAINT**

**INTRODUCTION**

1. This action seeks redress for collection practices that violate the Fair Debt Collection Practices Act, 15 U.S.C. § 1692.

**JURISDICTION AND VENUE**

2. The court has jurisdiction to grant the relief sought by the plaintiffs pursuant to 15 U.S.C. § 1692k and 28 U.S.C. §§ 1331 and 1337. Venue in this District is proper in that defendant directed its collection efforts into the District.

**PARTIES**

3. Plaintiff Collin Jilla is an individual who resides in Milwaukee, Wisconsin.

4. Plaintiff Mary Maciejewski is an individual who resides in St. Francis, Wisconsin.

5. Plaintiffs are “consumers” as defined in the FDCPA, 15 U.S.C. § 1692a(3), in that the defendant attempted to collect alleged debts which have been incurred for personal, family or household purposes.

6. Defendant Client Services, Inc. ("CS") is a debt collection agency with offices in Missouri.

7. CS is engaged in the business of collecting upon defaulted debts owed to others and incurred for personal, family or household purposes. CS is a debt collector as defined in 15 U.S.C. § 1692a.

### **FACTS**

8. On or about June 6, 2005, CS sent Plaintiff Jilla a debt collection letter regarding an alleged debt. See Exhibit A.

9. On or about June 7, 2005, CS sent Plaintiff Maciejeski a debt collection regarding an alleged debt. See Exhibit B.

10. Both Exhibits A and B state:

"Our intention is to contact the Secretary of State to compile data about the company which may contain the following information.

- a. Date of Incorporation
- b. Name and address of owner/officers
- c. Confirmation of property/assets
- d. Name of bank"

11. Upon information and belief, Defendant did not have a specific intent to inquire about assets, property, bank accounts, or anything else from the Secretary of State.

12. Defendant in fact did not contact the Secretary of State regarding the plaintiffs.

### **COUNT I—FDCPA**

13. Plaintiff incorporates the above numbered paragraphs by reference.
14. The defendant has violated 15 U.S.C. § 1692e, by making a false representation.

### **CLASS ALLEGATIONS**

15. Plaintiff brings this claim on behalf of a class, consisting of (a) all natural persons in the State of Wisconsin (b) who were sent a collection letter in the form of Exhibit A, (c) seeking to collect a debt for personal, family or household purposes, (d) on or after a date one year prior to the filing of this action, (e) that was not returned by the postal service.

16. The class is so numerous that joinder is impracticable. On information and belief, there are more than 50 members of the class.

17. There are questions of law and fact common to the members of the class, which common questions predominate over any questions that affect only individual class members. The predominant common question is whether the defendant intended to contact the Secretary of State as stated in the form letter.

18. Plaintiff's claim is typical of the claims of the class members. All are based on the same factual and legal theories.

19. Plaintiff will fairly and adequately represent the interests of the class members. Plaintiff has retained counsel experienced in consumer credit and debt collection abuse cases.

20. A class action is superior to other alternative methods of adjudicating this dispute. Individual cases are not economically feasible.

WHEREFORE, plaintiff requests that the Court enter judgment in favor of plaintiff and against defendant for:

- a. Statutory damages;
- b. Attorney's fees, litigation expenses and costs of suit;
- c. Such other or further relief as the Court deems proper.

**JURY DEMAND**

Plaintiff demands trial by jury.

Respectfully submitted,

/S/ Robert K. O'Reilly

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Robert K. O'Reilly (SBN 1027032)

Shpetim Ademi (SBN 1026973)

Jason Altman (SBN 1053393)

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(414) 482-8000

(414) 482-8001 (FAX)

## **Exhibit A**

**CLIENT SERVICES, INC.**

3451 HARRY TRUMAN BLVD  
ST CHARLES, MO 63301-4047  
636-947-2321 or 800-521-3236

06/06/2005

007644\*\*001\*\*038\*\*\*ALL FOR AADC 530  
COLLIN M JILLA  
3361 W RUSKIN ST  
MILWAUKEE WI 53215-4223

**REFERENCE NO.**

4951137

RE:ELAN FINANCIAL SERVICES  
BALANCE DUE: \$4,713.83

As stated in our previous correspondence, the above account was assigned to us by your creditor for payment in full.

Our intention is to contact the Secretary of State to compile data about the company which may contain the following information.

- a. Date of Incorporation
- b. Name and address of owner/officers
- c. Confirmation of property/assets
- d. Name of bank

Either remit the balance due immediately or phone us to make suitable arrangements. Our toll free number is 1-800-521-3236.

Sincerely,

TIM LEE

This communication is from a professional debt collection agency. This is an attempt to collect a debt. Any information obtained will be used for that purpose.

## **Exhibit B**

**CLIENT SERVICES, INC.**

3451 HARRY TRUMAN BLVD  
ST CHARLES, MO 63301-4047  
636-947-2321 or 800-521-3236

06/07/2005

006790\*\*053\*\*019\*\*\*\*\*MIXED AADC 630  
MARY L MACIEJEWSKI  
1217 E NORWICH AVE APT 4  
SAINT FRANCIS WI 53235-4572

**REFERENCE NO.**

4955044



RE:US BANK - IL  
BALANCE DUE: \$2,520.65

As stated in our previous correspondence, the above account was assigned to us by your creditor for payment in full.

Our intention is to contact the Secretary of State to compile data about the company which may contain the following information.

- a. Date of Incorporation
- b. Name and address of owner/officers
- c. Confirmation of property/assets
- d. Name of bank

Either remit the balance due immediately or phone us to make suitable arrangements. Our toll free number is 1-800-521-3236.

Sincerely,

LISA FRANKS

This communication is from a professional debt collection agency. This is an attempt to collect a debt. Any information obtained will be used for that purpose.